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WRITER LICENSED IN:

NEW YORK AND NEW JERSEY

December 6, 2012

Magistrate Judge Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Burke, Brian v. Cullen & Troia, P.C. and Kenmore Associates, L.P.
Case No. 1:12-cv-04280-GBD-GBD

Dear Judge Gorenstein:

Plaintiff, Brian Burke ("Plaintiff"), submits his unopposed letter motion to extend the deadlines to amend pleadings, to complete discovery, to file dispositive motions, and to file a joint pretrial order, as well as the current trial date.

On August 8, 2012, the Court issued its case management plan and scheduling order requiring the pleadings to be amended by October 4, 2012, discovery to be completed by November 1, 2012, dispositive motions to be filed by December 6, 2012, a joint pretrial order to be filed by February 7, 2013, and the parties to be ready for trial within 48 hours notice on or after March 14, 2013. (Doc. 13).

On September 19, 2012, the Court issued an order staying discovery until 17 days after completion of the settlement conference. (Doc. 23). Due to scheduling conflicts and Hurricane Sandy, a settlement conference has not yet taken place and is currently scheduled for December 12, 2012. (Doc. 29). As a result, discovery remains stayed. Therefore, Plaintiff requests the Court extend each of these deadlines and proposes the following new deadlines:

Amendment of Pleadings:	March 8, 2013
Discovery Completion:	April 12, 2013
Dispositive Motions to be Filed:	May 10, 2013
Joint Pretrial Order to be Filed:	August 9, 2013
Parties to be Ready for Trial:	September 9, 2013

Counsel for Plaintiff has conferred with counsel for Defendant Cullen & Troia, P.C. and counsel for Defendant Kenmore Associates, L.P., who advised that Defendants do not oppose the relief requested herein.

Best regards,

s/ Jeanne Lahiff

Jeanne Lahiff

NY Bar No. 2252435

Weisberg & Meyers, LLC

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